

EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
MICHELLE CLARK,

Plaintiff,

-against-

TARGET CORPORATION,

Defendant.
-----X

Index No.: 154122/2018

Date of Filing: 5/3/18

SUMMONS


Plaintiff designates New York
County as the place of trial.

The basis of the venue is
Plaintiff's residence.

To the above named Defendant

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's attorneys within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if the summons is not personally delivered to you within the State of New York); and in the case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Jericho, New York
May 3, 2018



JOHN PAPADOPOULOS
FRIEDMAN & SIMON, L.L.P.
Attorneys for Plaintiff
390 North Broadway, Suite 210
Jericho, New York 11753
(516) 932-0400

Defendant's Address:
TARGET CORPORATION
CT Corporation System
111 Eighth Avenue
New York, NY 10011

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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MICHELLE CLARK,

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Index #: 154122/2018

VERIFIED COMPLAINT

Plaintiff, by her attorneys, Friedman & Simon, L.L.P., complaining of the Defendant herein
alleges upon information and belief as follows:

AS AND FOR A FIRST CAUSE OF ACTION

FIRST: That at all times hereinafter mentioned the Plaintiff, MICHELLE CLARK, was
and still is a resident of the County of New York, State of New York.

SECOND: Upon information and belief, that at all times hereinafter mentioned Defendant,
TARGET CORPORATION, was and still is a foreign business corporation, authorized to business
under and by virtue of the laws of the State of New York.

THIRD: That at all times herein mentioned the Defendant, TARGET CORPORATION, its
agents, servants and employees owned the premises known as and by 112 West 34th Street, in the
County and State of New York.

FOURTH: That at all times herein mentioned the Defendant, TARGET CORPORATION, its
agents, servants and employees leased the premises known as and by 112 West 34th Street, in the
County and State of New York.

FIFTH: That at all times herein mentioned the Defendant, TARGET CORPORATION, its
agents, servants and employees controlled the premises known as and by 112 West 34th Street, in the
County and State of New York.

SIXTH: That at all times herein mentioned the Defendant, TARGET CORPORATION, its agents, servants and employees maintained the premises known as and by 112 West 34th Street, in the County and State of New York.

SEVENTH: That at all times herein mentioned the Defendant, TARGET CORPORATION, it agents, servants and employees managed the premises known as and by 112 West 34th Street, in the County and State of New York.

EIGHTH: That at all times herein mentioned the Defendant, TARGET CORPORATION, its agents, servants and employees operated the premises known as and by 112 West 34th Street, in the County and State of New York.

NINTH: That the Defendant, its agents, servants and/or employees had a duty to properly maintain said premises and to keep said premises in a reasonably safe condition.

TENTH: That the Defendant, its agents, servants and/or employees breached its duty to properly maintain said premises and to keep said premises in a reasonably safe condition.

ELEVENTH: That on January 5, 2018, the Plaintiff, MICHELLE CLARK, was lawfully upon said premises.

TWELFTH: That on January 5, 2018, while lawfully upon said premises, the Plaintiff, MICHELLE CLARK, was caused to slip and fall and sustain serious and severe personal injuries as a result of the negligence of the Defendant, its agents, servants, and/or employees.

THIRTEENTH: That the Defendant, its agents, servants and/or employees was careless, reckless, and negligent in the ownership, operation, construction, management, maintenance and control of said premises in causing, allowing and permitting a dangerous, defective, trap-like, unsafe and/or hazardous condition to exist at or near its entrance.

FOURTEENTH: That the Defendant had both actual and constructive notice of the dangerous, defective, unsafe and hazardous condition(s).

FIFTEENTH: That the Defendant created the dangerous, defective, unsafe and/or hazardous condition(s).

SIXTEENTH: That the Defendant, its agents, servants, and/or employees, failed or neglected to cause such defect to be remedied within a reasonable time after receiving notice of the defect and/or after creating the condition, and/or failed to make the place otherwise reasonably safe within a reasonable time.

SEVENTEENTH: That the Plaintiff, MICHELLE CLARK, was injured as a result of the negligence and failure of the Defendant, its agents, servants, and/or employees, to cause such defect to be remedied or to otherwise make the place reasonably safe within a reasonable time after receiving notice of the defect and/or creating the condition.

EIGHTEENTH: That the foregoing occurrence was caused solely and wholly as a result of the negligence of the Defendant, its agents, servants, and/or employees, without any negligence on the part of the Plaintiff contributing thereto.

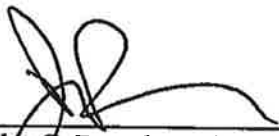
NINETEENTH: That as a result of the foregoing, Plaintiff, MICHELLE CLARK, sustained serious, severe and permanent personal injuries and was rendered sick, sore, lame, and disabled; Plaintiff, MICHELLE CLARK, was caused to suffer great pain, discomfort, and disability and, upon information and belief, will continue to suffer pain, discomfort, and disability in the future; Plaintiff, MICHELLE CLARK, was caused to undergo hospital and medical care, aid and attention, and upon information and belief, may continue to require to undergo medical care, aid and attention for a long period of time to come in the future; Plaintiff, MICHELLE CLARK, was obliged to expend and incur large sums of monies for medical care, aid and attention and, upon information and belief, will

continue to be obliged to expend and incur large sums of monies for future medical care, aid and attention; Plaintiff, MICHELLE CLARK, was caused to become incapacitated from her usual vocation and avocation, and upon information and belief, may continue to be caused to remain away from her usual vocation and avocation for a long period of time to come in the future.

TWENTIETH: That as a result of the foregoing Plaintiff has been damaged in an amount that exceeds the jurisdictional limits of all lower courts.

WHEREFORE, Plaintiff demands judgment against the Defendant in an amount that exceeds the jurisdictional limits of all lower courts, together with the costs and disbursements of this action.

Dated: Jericho, New York
May 3, 2018



John G. Papadopoulos
FRIEDMAN & SIMON
Attorneys for Plaintiff
390 North Broadway, Suite 210
Jericho, New York 11753
(516) 932-0400

ATTORNEY VERIFICATION

STATE OF NEW YORK)
)
COUNTY OF NASSAU)


JOHN G. PAPADOPOULOS, an attorney at law, duly admitted to practice in the Courts of the State of New York, affirms the following, under the penalties of perjury:

1. I am a member of the law firm of FRIEDMAN & SIMON, the attorneys for the Plaintiff in this action. I have read the Summons and Verified Complaint and know the contents thereof. Upon information and belief, deponent believes the matters therein stated to be true.

2. The reason this verification is made by deponent and not by the Plaintiff is that the Plaintiff does not reside in the County her attorneys maintain their offices.

3. The source of my information and the grounds therefore are communications, papers, reports and investigations contained in the file.

Dated: Jericho, New York
May 3, 2018



John G. Papadopoulos

FRIEDMAN & SIMON, L.L.P.

Index No.:

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

MICHELLE CLARK

Plaintiff

-against-

TARGET CORPORATION

Defendant

SUMMONS & VERIFIED COMPLAINT

FRIEDMAN & SIMON, L.L.P.
Attorneys for Plaintiff
390 NORTH BROADWAY STE 210
JERICHO, NEW YORK 11753
(516) 932-0400

To:

Signature (Rule 130-1.1-a)

Attorney(s) for

Print name beneath

Service of a copy of the within
Dated:

is hereby admitted.

Attorney(s) for

PLEASE TAKE NOTICE

☒ **NOTICE OF ENTRY**

that the within is a (certified) true copy of a
duly entered in the office of the Clerk of the within named Court on

☐ **NOTICE OF SETTLEMENT**

that an Order
settlement to the Hon.
on

of which the within is a true copy will be presented for
one of the judges of the within named Court,

Dated:

Yours, etc.

FRIEDMAN & SIMON, L.L.P.
Attorneys for

To
Attorney(s) for

390 North Broadway, Suite 210
Jericho, New York 11753

201805100699

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State of New York - Department of State
Division of Corporations

Party Served:
TARGET CORPORATION

Plaintiff/Petitioner:
CLARK, MICHELLE

TARGET CORPORATION
1000 NICOLLET MALL
MINNEAPOLIS, MN 55403

Dear Sir/Madam:

Enclosed herewith is a legal document which was served upon the Secretary of State on 05/09/2018 pursuant to SECTION 306 OF THE BUSINESS CORPORATION LAW.

This copy is being transmitted pursuant to such statute to the address provided for such purpose.

Very truly yours,
Division of Corporations

